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**MEMO ENDORSED**

January 7, 2022

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**By ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Re: Kane, et al., v. Bill de Blasio, et al., No. 21 Civ. 7863

Re: Keil, et al., v. The City of New York, et al., No. 21 Civ. 8773 (consolidated with *Kane*)

Dear Judge Caproni:

We represent the *Keil* Plaintiffs in the *Kane* lawsuit, referenced above. I am writing on behalf of my clients and also on behalf of Attorney Sujata Gibson, attorney for the *Kane* plaintiffs, to request an emergency extension of one day on the obligation of plaintiffs to submit a consolidated complaint pursuant to the Court's endorsed order dated December 17, 2021 and the Court's docket entry order dated December 27, 2021. Assistant Corporation Counsel Lora Minicucci has consented to our request on behalf of all Defendants.

We apologize to the Court for not providing advance notice of our extension request. A member of Ms. Gibson's family has become quite ill during the past week, with critical needs last night. As a result, Ms. Gibson needs until the coming Monday, January 10, 2022, to edit our draft consolidated complaint. We respectfully ask the Court to extend the time for the submission of plaintiffs' consolidated complaint until then.

Respectfully submitted,

/s/ Jonathan R. Nelson  
Nelson Madden Black LLP  
Counsel for Plaintiffs  
By Jonathan Robert Nelson (JN-8796)

cc: All counsel via ECF

Application GRANTED. The deadline to file the consolidated amended complaint is adjourned to **Monday, January 10, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

Date: January 7, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE